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Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: HIGH-TECH EMPLOYEE ANTITRUST
LITIGATION

Case No. 5:11-cv-2509

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**JOSEPH SAVERI LAW FIRM, INC.’S
MOTION TO ENLARGE TIME**

Pursuant to Local Rule 6-3, the Joseph Saveri Law Firm, Inc. (“JSLF”) submits this Motion seeking an extension of time to file a joint submission regarding attorneys’ fees. On July 9, 2015, the Court ordered that JSLF and Lieff Cabraser Heimann & Bernstein, LLP (“LCHB”) jointly submit a document on July 16, 2015, summarizing disputes concerning JSLF’s time entries, on an entry-by-entry basis. For the reasons briefly described below and more fully stated in the attached Declaration of Joseph R. Saveri, JSLF respectfully requests that the Court grant an extension to July 20, 2015 for JSLF and LCHB to file a joint submission.

JSLF and LCHB have engaged in time-consuming, exhaustive discussions to identify and attempt to resolve disputes concerning JSLF’s time entries. The process has been difficult, particularly given the volume of LCHB’s criticisms as well as LCHB’s refusal to provide written objections to most of the specific time entries until late in the evening on Wednesday, July 15, 2015. Despite these difficulties, LCHB and JSLF have been able to narrow the entries in dispute by over 100 entries. JSLF believes that further discussion between the parties could substantially narrow the entries in dispute.

1 For these reasons, JSLF respectfully requests that the Court grant JSLF's motion to enlarge
2 time.

3 Dated: July 16, 2015

JOSEPH SAVERI LAW FIRM, INC.

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5 By: /s/ Joseph R. Saveri
Joseph R. Saveri

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